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DOCUMENT
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April 20, 2023

Via ECF

Hon. Valerie E. Caproni, U.S.D.J.
United States District Court
Southern District Of New York
40 Foley Square
New York, NY 10007

Re: Marian E. Parker v. Israel Discount Bank of New York, Inc.
S.D.N.Y. Docket No. 21-cv-07196 (VEC)

Dear Judge Caproni:

We represent defendant Israel Discount Bank of New York (hereinafter, “Defendant”) in the above-referenced matter. We write jointly with counsel for Plaintiff, pursuant to the Court’s Individual Practices in Civil Cases and Order of November 15, 2022 (ECF No. 47) to respectfully request that certain documents that Defendant wishes to file in support of its Motion for Summary Judgment be permitted to be filed under seal.

The documents the parties request to be filed under seal include Plaintiff’s medical and occupational therapy records as they pertain to the allegations in the Complaint regarding Plaintiff’s finger injury. As these records contain a mix of medical information both related and unrelated to the finger injury, such as Plaintiff’s health history, the parties respectfully request that these documents be permitted to be filed under seal.

Defendant also seeks to file under seal documents that address the Bank’s information security posture. As Plaintiff worked in the Bank’s Information Security group, some of the work-related correspondence on which Plaintiff was included discusses the Bank’s security posture. Defendant seeks to file documents Bates-numbered D0281 and D0310, which contain discussions of the Bank’s security efforts. Defendant seeks to file these documents under seal due to the potential harm that could be caused to Defendant, a financial institution, if information regarding its cybersecurity posture were made publicly available.

We thank the Court for its attention to this matter.


Respectfully submitted,

/s/ Keith A. Markel
Keith A. Markel

cc: All Counsel of Record (Via ECF)

Application GRANTED.

SO ORDERED.

 04/20/2023

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE